

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION

RUSSELL GEISSLER, BERNARD BAGLEY, )  
AND WILLIE JAMES JACKSON, ) Case No.: 4:17-cv-01746-MBS  
*individually and on behalf of others similarly* )  
*situated,* )  
Plaintiff ) DECLARATION OF  
vs. ) SAMUEL F. ARTHUR, III  
BRYAN P. STIRLING, Director of the South )  
Carolina Department of Corrections (SCDC), *in* )  
*his official capacity;* and JOHN B. MCREE, )  
M.D., Division Director of Health and )  
Professional Services for SCDC, *in his individual* )  
*capacity,* )  
Defendants. )

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I, Samuel F. Arthur, III, hereby declare and state as follows pursuant to 28 U.S.C. § 1746:

1. I am a shareholder of Aikens Bridges Elliott Tyler & Saleeby, PA located in Florence, South Carolina, and counsel for Defendants in the above-titled action.
2. On January 23, 2020, this Court granted preliminary approval to the Proposed Consent Decree for Chronic Hepatitis C Treatment, (ECF No. 178) (the “Consent Decree”) and attached Notice, (ECF No. 178-1). *See* ECF No. 183.
3. On February 3, 2020, I received confirmation from Defendant SCDC that the Notice had been posted in all the SCDC institutions on or before January 31, 2020, as required by the Consent Decree.



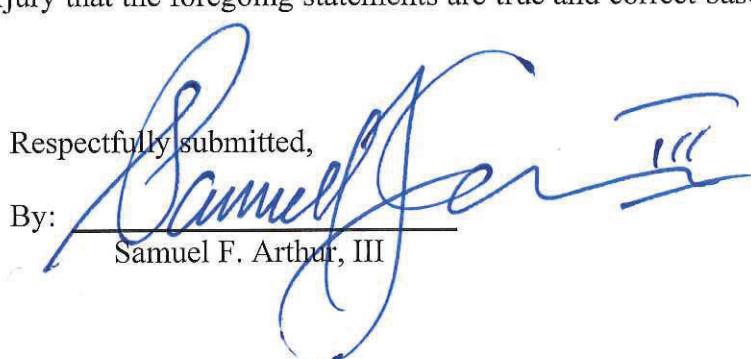
4. The Notice directs inmates and others to submit their comments or objections to the Consent Decree to [Treatment@SCHepC.com](mailto:Treatment@SCHepC.com) and/or two listed attorneys representing plaintiffs and defendants.
5. I am the attorney listed in the Notice as representing the Defendants.
6. To date, I have received correspondence from multiple inmates inquiring about the status of inmates receiving treatment for Chronic Hepatitis C. My interpretation of the correspondence is that it appears to be in the form of an inquiry about treatment and not an objection to the Consent Decree. However, should the Court desire to review the correspondence, the undersigned counsel will provide the correspondence to the Court for review should it be deemed necessary.

I declare under penalty of perjury that the foregoing statements are true and correct based on my personal knowledge.

Dated: May 18, 2020

Respectfully submitted,

By:

  
Samuel F. Arthur, III

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION**

I, James M. Griffin, hereby declare and state as follows pursuant to 28 U.S.C. § 1746:

1. I am a principal of Griffin Davis in Columbia, South Carolina, and counsel for Plaintiffs in the above-titled action.
2. On January 23, 2020, this Court granted preliminary approval to the Proposed Consent Decree for Chronic Hepatitis C Treatment, (ECF No. 178) (the “Consent Decree”) and attached Notice, (ECF No. 178-1). *See* ECF No. 183.
3. The Notice directs inmates and others to submit their comments or objections to the Consent Decree to [Treatment@SCHepC.com](mailto:Treatment@SCHepC.com) and/or two listed attorneys representing plaintiffs and defendants.
4. I am the attorney listed in the Notice as representing the Plaintiffs.

5. To date, while I have received inquiries about treatment or the settlement, I have received no objections to the Consent Decree.

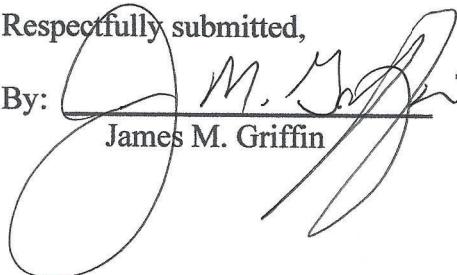
I declare under penalty of perjury that the foregoing statements are true and correct based on my personal knowledge.

Dated: May 18, 2020

Respectfully submitted,

By:

James M. Griffin

A handwritten signature in black ink, appearing to read "J. M. Griffin". The signature is fluid and cursive, with a large, stylized 'J' at the beginning.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION**

RUSSELL GEISSLER, BERNARD BAGLEY, )  
AND WILLIE JAMES JACKSON, ) Case No.: 4:17-cv-01746-MBS  
*individually and on behalf of others similarly* )  
*situated,* )  
*Plaintiff,* ) DECLARATION OF  
vs. ) CHRISTOPHER J. BRYANT  
**BRYAN P. STIRLING**, Director of the South )  
Carolina Department of Corrections (SCDC), *in* )  
*his official capacity; and JOHN B. MCREE,* )  
**M.D.**, Division Director of Health and )  
Professional Services for SCDC, *in his individual* )  
*capacity,* )  
*Defendants.* )

I, Christopher J. Bryant, hereby declare and state as follows pursuant to 28 U.S.C. § 1746:

1. I am an associate of Perkins Coie in Washington D.C. and counsel for Plaintiffs in the above-titled action.
2. On January 23, 2020, this Court granted preliminary approval to the Proposed Consent Decree for Chronic Hepatitis C Treatment, (ECF No. 178) (the “Consent Decree”) and attached Notice, (ECF No. 178-1). *See* ECF No. 183.
3. On January 26, 2020, I posted the Notice on [www.SCHepC.com](http://www.SCHepC.com) and created the Treatment@SCHepC.com email address.

4. On January 27, 2020, I provided all South Carolina Circuit Public Defenders with Copies of the Notice and a cover letter providing a brief overview of the Proposed Consent Decree, attached hereto as Exhibit A.
5. Inmates and others were directed by the Notice to submit any comments or objections to the Consent Decree to [Treatment@SCHepC.com](mailto:Treatment@SCHepC.com) and/or two named attorneys.
6. I have monitored the Treatment email account and, to date, while it has received inquiries about treatment or the settlement, it has received no objections to the Consent Decree.

I declare under penalty of perjury that the foregoing statements are true and correct based on my personal knowledge.

Dated: May 18, 2020

Respectfully submitted,

By:

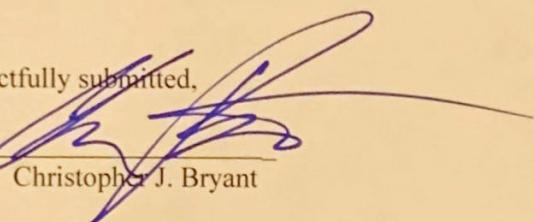
  
Christopher J. Bryant

Exhibit A to  
Christopher J. Bryant  
Declaration

Letter to Circuit Public Defenders Offices



700 13th Street, NW  
Suite 800  
Washington, D.C. 20005-3960

T +1.202.654.6200  
F +1.202.654.6211  
PerkinsCoie.com

January 27, 2020

Christopher J. Bryant  
CBryant@perkinscoie.com  
D. +1.202.654.6289  
F. +1.202.624.9513

**VIA FAX**

Circuit Public Defenders Offices

**Re: Proposed Settlement: Hepatitis C Treatment for SCDC Inmates (*Geissler v. Stirling*)**

Dear Chief Circuit Public Defender:

This fax is to inform you of a preliminarily approved class action settlement that, if approved, will provide Hepatitis C testing and treatment for inmates housed in South Carolina Department of Corrections prisons. The case is *Geissler v. Stirling*, 4:17-cv-1746-MBS, and the preliminarily approved settlement is attached to this letter.

We are providing each Circuit Public Defenders Office with this notice, as required by the Court. For more information, please visit [www.SCHepC.com](http://www.SCHepC.com).

Very truly yours,

Christopher J. Bryant

CJB